

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JILL BALLARD, REBECCA VARNO,)	
and MARK POKORNI, on behalf of)	
themselves and the class members)	
described herein,)	No. 3:18-cv-121-MEM
)	
Plaintiffs,)	Judge Malachy E. Mannion
)	
v.)	Magistrate Judge Daryl F. Bloom
)	
NAVIENT CORPORATION,)	
NAVIENT SOLUTIONS, INC., and)	ELECTRONICALLY FILED
NAVIENT SOLUTIONS, LLC,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE
THIRD AMENDED COMPLAINT**

Plaintiffs JILL BALLARD, REBECCA VARNO, and MARK POKORNI hereby move pursuant to Federal Rules of Civil Procedure 15 and 16 for leave to file their Third Amended Complaint, a redlined copy of which is attached hereto as Exhibit A, and a clean copy of the same is attached hereto as Exhibit B. Attached as Exhibit C is a Proposed Order. The reasons for this motion are set forth more fully in the accompanying brief.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' Motion for Leave to File their Third Amended Complaint.

Respectfully Submitted,

/s/ Cassandra Miller

Cassandra Miller

Illinois ARDC #: 6290238

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CERTIFICATE OF SERVICE

I certify that on the 28th day of March, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification to counsel of record for the defendant, namely:

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DATED: March 28, 2024

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